

SETH M. BARSKY,  
Deputy Assistant Attorney General  
Environment & Natural Resources Division  
S. JAY GOVINDAN, Section Chief  
NICOLE M. SMITH, Assistant Section Chief  
RICKEY D. TURNER, JR., Senior Attorney  
U.S. Department of Justice  
Environment and Natural Resources Division  
Wildlife and Marine Resources Section  
999 18th Street, South Terrace, Suite 370  
Denver, CO 80202  
Tel | (303) 844-1373; Fax | (303) 844-1350  
E-mail: rickey.turner@usdoj.gov

*Attorneys for the Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CENTER FOR BIOLOGICAL DIVERSITY  
and DEFEND THEM ALL FOUNDATION,

*Plaintiffs,*

v.

NATIONAL MARINE FISHERIES  
SERVICE; and GINA RAIMONDO,  
Secretary of Commerce,

*Defendants.*

Case No. 3:24-CV-03772-EMC

**UNOPPOSED MOTION FOR 30-DAY  
EXTENSION RE DEFENDANTS'  
RESPONSE TO PLAINTIFFS'  
COMPLAINT**

Defendants, the National Marine Fisheries Service and Gina Raimondo, Secretary of  
Commerce, move this Court for a 30-day extension for Defendants' response to Plaintiffs'

complaint – from September 13, 2024 to October 14, 2024. In support of this motion, Defendants state the following:

1. Defendants’ response to Plaintiffs’ complaint is due on September 13, 2024.
2. The Parties desire to explore settlement possibilities and require additional time to have those discussions.
3. For those reasons, Defendants request a short 30-day extension on their response to Plaintiffs’ complaint – from September 13, 2024 to October 14, 2024.
4. Plaintiffs do not oppose this extension.

DATED: August 13, 2024

Respectfully submitted,

SETH M. BARSKY  
Deputy Assistant Attorney General  
S. JAY GOVINDAN, Chief  
NICOLE M. SMITH, Assistant Chief  
Environment and Natural Resources Division

/s/ Rickey D. Turner, Jr.  
RICKEY D. TURNER, JR.  
Senior Attorney  
U.S. Department of Justice  
Environment and Natural Resources Division  
Wildlife and Marine Resources Section  
999 18th Street, South Terrace, Suite 370  
Denver, CO 80202  
Tel | (303) 844-1373; Fax | (303) 844-1350  
E-mail: rickey.turner@usdoj.gov

*Attorneys for the Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed and served the foregoing filing with the Clerk of the Court for the United States District Court for the District of Arizona using the CM/ECF system.

/s/ Rickey D. Turner, Jr.  
*Attorney for Defendants*